

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

**NICOLE HINSON, Individually and as
Next Friend of C.H., a Minor, and
Cameron Hinson, Texas residents,**

Plaintiffs

V.

**DOREL JUVENILE GROUP, INC., a
Massachusetts corporation**

Defendant.

Cause No. 2:15-CV-713-JRG-RSP

Jury Demand

NOTICE

Pursuant to the Court's Docket Control Order, the parties file this notice to notify the court of any agreements regarding motions in limine. The parties have reached agreements on the following motions in limine as set out below.

Plaintiffs' agree to the following Defendant's Motions in Limine:

1. “Evidence or argument concerning the filing of a Motion in Limine on any topic”;
2. “Evidence or argument concerning the insurance industry or Dorel’s insurance coverage”;
3. “Evidence or argument concerning of Plaintiffs’ possible taxation or the need to pay an attorney”;
5. “Evidence or argument concerning EMS’s transfer of C.H. to the ER in a rear facing direction/seat”;
7. “Evidence or argument concerning counsel’s compensation or the location of their offices should be excluded”

Defendant agrees to the following Plaintiffs' Motions in Limine:

3. Alleged liability of non-designated persons or entities -- Agreed as to Trinity Mother Frances Hospital and Dr. Mark Anderson only. Not agreed as to Deborah Williams.
5. "Deep pockets" – Agreed. No argument Plaintiffs are only after DJG's "deep pockets".
7. Disparaging comments about Plaintiffs' lawyers – Agreed.
10. Acts or Omissions of Trinity Mother Frances and staff -- Agreed as to any argument of liability (See No. 3), but not agreed as to the facts of C.H.'s medical treatment.
11. Inference regarding C.H.'s early discharge from Baylor - Agreed as to argument of exacerbating injury or medical outcome, but not agreed as to fact it happened.
18. Testing After Discovery Deadline - Agreed.
19. Other Gary Whitman cases outcome - Agreed.
24. Cameron Hinson was speeding – Agreed
25. Circumstances of C.H.'s birth – Agreed

Agreed to by:

/s/ Anthony A. Avey
Counsel for Defendant

Respectfully submitted,

/s/George Cowden IV
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ATTORNEYS FOR PLAINTIFF

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document has been forwarded to all counsel, in accordance with the Federal Rules of Civil Procedure on the 3rd day of June, 2016.

/s/George Cowden IV
George Cowden IV